

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

William H. Gnodtke, Treasurer Michigan Republican State Committee 2121 E. Grand River Lansing, MI 48912

DEC 23 1998

Identification Number:

C00041160

Reference:

October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Gnodtke:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Please provide a Schedulc H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

On Schedule D of your previous report, you disclosed a debt(s) owed to several payees. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-On Schedule D of your previous report, you disclosed a debt owed to your committee from the Bloomfield Campaign Committee. This obligation, however, has been omitted from this report. Please amend your report to include this debt on Schedule D supporting Line 9 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

## MICHIGAN REPUBLICAN STATE COMMITTEE PAGE 3

-Please clarify all expenditures made for "production and development" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Richard Ng

Reports Analyst

Reports Analysis Division

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98033721205 A ITEMIZED RECEIPTS Page : 1 of 0000103062 Line: 11b Any information copied from such Reports and Statemente may not be said or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to colicit contributions from such committee. NAME OF COMMITTEE MICHIGAN REPUBLICAN STATE COMMITTEE A. Republican Mational Committee EMPLOYER DATE AMEXINT 310 First Street, 5.E. Washington, DC 20003 16,250.00 09/17/98 OCCUPATION Receipt for: Aggragate YTD: \$ " 16,250.00 AMOUNT DRTE B. Upton for All of Us EMPLOYER 07/17/98 10,000.00 P.O. Box 490 St. Joseph, MI 49085-0490 OCCUPATION • Receipt for: Aggregate VID: \$ 36,000.00 AMOUNT DATE C. Upton for All of Us 26,000.00 08/13/98 P.D. Box 490 St. Joseph, MI 49085-0490 OCCUPATION Receipt for: Aggregate YTD: \$ 36,000.00 AMOUNT DATE EMPLOYER D. Apollo Group, Inc. Legis. Lead 3,400.00 07/16/98 4615 East Elwood St. Phoenix, AZ 85040 OCCUPATION Receipt for: Aggregate YTD: \$ 3,400.00 DATE AMOUNT EMPLOYER. **6**. OCCUPATION Receipt for: Aggregate YTD: \$ TRUCMA DATE EMPLOYER F. OCCUPATION

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Page:

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Line: 12

Any information copied from such Reports and Statements way not be sold or used by any person for the purpose of solicities contributions or for commercial purposes, other than using the name and address of any political committee to molicit contributions from such committee.

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KAME OF COMMITTEE MICHIGAN REPUBLICAN STATE COMMITTEE

> A. Republican Mational Committee EMPLOYER 310 First Street, S.E. Washington, DC 20003

08/20/98

TRUCMA STAR 6,000.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 6,000.00

DATE

07/24/98

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10,000.00

B. Knollenberg for Congress Comm EMPLOYER 27867 Orchard Lake Ed. Farmington Hills, MI 49334

OCCUPATION

Receipt for:

Aggragate YTD: \$

10,000.00

C. Dave Camp for Congress

EMPLOYER

DATE 07/24/98 AMOUNT 10,000.00

5915 Eastman Ave., Ste 100 Midland, MI 48640

OCCUPATION

Receipt for:

Aggregate YTD: \$

10,000.00

DATE

07/24/98

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D. Ehlers for Congress 1848 Morningside Dr., Grand Rapids, MI 49546

OCCUPATION

EXPLOYER

Receipt for:

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